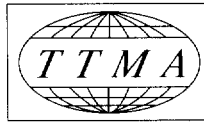


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NHTSA 02-72150-44

Richard P. Bowling • President

Truck Trailer Manufacturers Association • 1020 Princess Street • Alexandria, Virginia 22314-2247 • (703) 549-3010 • Fax (703) 549-3014

January 13, 2003

Mr. Taylor Vinson  
Office of Chief Counsel  
US Department of Transportation  
National Highway Traffic Safety Administration  
400 Seventh Street S.W.  
Washington, DC 20590

2003 JAN 28 A 10:18  
OFFICE OF CHIEF COUNSEL

Dear Mr. Vinson:

The Truck Trailer Manufacturers Association is an international trade association representing manufacturers of commercial trailers (with a single axle rated at 10,000 lbs or greater) and their component suppliers. On behalf of the TTMA members we are submitting the following request.

The TREAD Act requires trailer manufacturers to submit production data for the past 10 years to establish a base line and then to submit quarterly production data beginning in 2003. We are requesting that this production data be treated as confidential information for the following reasons.

1. The only previous production data collection by a federal government agency has been by the US Bureau of the Census which collected this information until January 2001 at which time the survey was discontinued. This was a monthly data collection and all data submitted by trailer manufacturers was given total confidentiality. No one, including this Association and its members, could request or receive individual data. The Census Bureau published the monthly data collection in a total number by category of trailer and, in fact, when Census did not receive a sufficient number of responses in a given category, a total for that category was not shown since, according to Census, a limited response might effectively disclose a reporting company's submission.
2. Industry production data that is otherwise being collected by independent for-profit firms and private economic forecasting firms is only available to clients of the firms and then again, only in an aggregate form. Individual company submissions are not shared with clients. Individual production data is kept strictly confidential.
3. With the exception of a small number of TTMA members, the 80+ TTMA trailer manufacturer companies are privately held firms and therefore, are not required to report production data to government agencies. They do not publish production data, but rather consider it highly confidential information.

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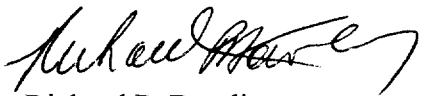
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Page Two  
Mr. Taylor Vinson  
January 13, 2002

4. The trailer manufacturing industry is extremely competitive and diverse in the product lines that are manufactured. The publication of production data by individual manufacturers would disclose information that could be used by competitors to identify sales trends and competitor moves in product lines. This could adversely affect the competitive standing of some trailer manufacturers.

For the above reasons we are requesting that NHTSA treat as confidential all production data submitted by trailer manufacturers under the TREAD Act with release of this data only as required and then only in the aggregate.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard P. Bowling", with a stylized flourish at the end.

Richard P. Bowling  
President

RPB/lkw